BEUC The European Consumer Organisation

The Consumer Voice in Europe

Permanent Representation to the EU

B - Brussels

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10 December 2015

Re: European Commission's Campylobacter strategy

Dear Attaché,

On 15 December, the Standing Committee on Plants, Animals, Food and Feed will discuss the European Commission's strategy to control Campylobacter in the food chain. The Commission is proposing to introduce a process hygiene criterion (PHC) for Campylobacter and to authorise the use of peroxyacetic acid (PAA) to decontaminate poultry carcases.

Campylobacter is the most common cause of food poisoning in the EU, affecting at least over 200,000 people each year[1]. For that reason, we strongly **welcome EU action to make consumers' chicken safer**. We fully **support the setting of a Campylobacter PHC** and we are pleased that Member States will have to verify and enforce it (as well as the Salmonella PHC). However, **we do not believe authorising PAA or any other kind of antimicrobial rinse is the right way to go**.

- **EU consumers have no appetite for chicken rinsed with chemicals**

Research consistently shows **Europeans do not want to eat meat that has been treated with antimicrobial rinses**.

In the UK, it was found most British consumers would not be willing to buy chicken meat that has been treated chemically[2]. British consumers' preference for alternatives to chemical washes they perceive as more natural (e.g. steam treatment, rapid surface chilling) was further confirmed by qualitative research[3]. In another study in Finland, nearly 90% of respondents were of the opinion that they would not choose chemically treated poultry meat[4]. Likewise, in Denmark, a 2007 survey found chlorine washes on meat to be "*totally unacceptable*" to 85% of respondents[5].

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1 http://www.efsa.europa.eu/en/press/news/150128

2 Which? online survey of 1,406 UK adults (aged 16+) conducted between 10 Feb-14Feb 2011. 60% of respondents were unlikely to buy chicken that had been sprayed or washed with a mild acid such as lactic acid, and 67% were unlikely to buy chicken that had been treated with chlorine.

3 Which? and UK Government Office for Science (2015). Food System Challenges.

4 Heikkilä, J., Pouta, E., Forsman-Hugg, S., Mäkelä, J. (2011) Consumer risk perceptions of zoonotic, chemical and gm risks: the case of poultry purchase intentions in Finland. Paper prepared for presentation at the EAAE 2011 Congress Change and Uncertainty.

5 Sara Korzen, Peter Sandøe, Jesper Lassen (2011) "Don't wash my meat: public perceptions of decontamination in meat production", British Food Journal, Vol. 113 Iss: 5, pp.598 – 612.

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- **PAA and other rinses will dilute the EU "farm to fork" approach**

The EU has an integrated approach to food hygiene and safety "*from the farm to the fork*", whereby good hygiene practices (GHP) must be in place all along the production chain to guarantee that food sold to the final consumer is safe. As long as GHP are complied with and the prevention-oriented Hazard Analysis Critical Control Points (HACCP) programmes are well managed by food business operators (FBOs) - as required by EU law – there should be **no need for additional treatments of meat**.

Rather, we are concerned that such treatments may result in a lowering of EU hygiene standards as less scrupulous FBOs might see them as a **convenient substitute for good husbandry and hygienic practices** on the farm or in the slaughterhouse.

Audits from the EU Food & Veterinary Office have regularly reported on deficiencies in poultry slaughter hygiene in visited EU abattoirs. We are concerned that, if PAA is authorised, we will move to a system where **even less care is taken to prevent the contamination of meat during the slaughter process**. This is all the more worrying as PAA rinses have questionable efficacy on Campylobacter and other food-poisoning bacteria.

- **Evidence of PAA efficacy on Campylobacter is equivocal**

Evidence of PAA efficacy provided to EFSA is not convincing (see diagram in Annex I). It either mostly rests on effects on non-pathogenic bacteria and/or on low to medium strength of evidence studies.

Moreover, no clear evidence was provided that efficacy of PAA remains after storage of treated carcases. EFSA recommended further studies are needed to check whether contamination levels are not on the rise at the end of poultry meat's shelf life.

- **PAA use raises health concerns**

The European Food Safety Authority (EFSA) could not clearly rule out the risk of antimicrobial resistance (AMR) resulting from PAA use as no studies directly investigating this issue were provided to EFSA. The agency recommended further research at laboratory level before AMR risk from PAA use can be fully excluded[6].

This was **recognised and reflected** in comments[7] the EU submitted to Codex Alimentarius in 2010 regarding *Proposed Draft Guidelines for the Control of Campylobacter and Salmonella spp. in Chicken Meat*. To our knowledge, **no evidence has been provided in the meantime to clear this concern**.

…/…

[6] EFSA (2014). Scientific Opinion on the evaluation of the safety and efficacy of peroxyacetic acid solutions for reduction of pathogens on poultry carcases and meat.

[7] CCEURO 27th Session (2010). CRD 2. EU comments on Agenda Item 8.

- **Infected poultry meat is only the tip of the iceberg**

PAA and similar end-of-pipe washes applied at slaughterhouse level are last resort attempts to "clean up" meat and make up for the lack of proper preventative measures earlier in the chain. They only have a limited effect – if any – on *meat*.

Meat, however, is far from being the main contamination pathway when it comes to Campylobacter. According to EFSA, handling, preparation and consumption of poultry meat may account for 20% to 30% of human cases of campylobacteriosis, while **50% to 80%** may be attributed to the chicken reservoir as a whole[8] (i.e. live chickens and hens).

EFSA favours a "prevention over cure" approach and recommends tackling Campylobacter as early in the food chain as possible. The EU food safety watchdog stated that "*the public health benefits of controlling Campylobacter in primary broiler production are expected to be greater than control later in the chain as the bacteria may also spread from farms to humans by other pathways than broiler meat*"[8] (i.e. air, water, etc.). **Campylobacter control must start on farm if we are to make a real difference for the health of Europeans**.

- **Campylobacter control options other than chemical decontamination are available**

Stricter enforcement of current EU hygiene and safety requirements as well as control options that are acceptable to EU consumers **must be favoured over treatments they disapprove of.**

Recent developments at country level, notably in the UK, have demonstrated that **a whole host of measures can be implemented to control Campylobacter** – other than rinsing chicken with chemicals – which seem to deliver promising results[9]. These include strengthened biosecurity on farm, no thinning[10], rapid testing tools for farmers to check if poultry flocks are contaminated with Campylobacter, strict compliance with good slaughter hygiene. **All these measures, we believe, go in the right direction**. The setting of an EU PHC for Campylobacter **will help accelerate their uptake** by operators along the chain.

Control options at the end of the chain are also being trialled (e.g. rapid surface chilling or steam-and-ultrasound treatment of carcases, leak-proof packaging, and 'roast-in-bag' chicken). While **action earlier in the chain must be favoured**, such measures, as long as they are acceptable to consumers, could be considered as additional control tools.

…/…

[8] EFSA (2011). BIOHAZ panel Scientific Opinion on Campylobacter in broiler meat production: control options and performance objectives and/or targets at different stages of the food chain.

[9] Latest data published by the UK Food Standards Agency showed some retailers have significantly reduced Campylobacter levels. Pressure is now on others to follow suit http://www.food.gov.uk/news-updates/news/2015/14701/campylobacter-survey

[10] Thinning is the practice of 'part harvesting' chickens from flocks through the growing cycle. The practice is very stressful for the animals and increases the risk of cross-contamination between birds.

In its 2010 comments to Codex Alimentarius[11], the EU noted that "*European consumers are not willing to accept chemical treatments for the decontamination of poultry carcasses when the appropriate level of protection can be achieved without their use*". **This is still fully valid today** and we call on the EU to continue taking full account of consumers' opposition to poultry rinses when alternatives exist.

We urge EU action to reduce Campylobacter levels but believe this cannot be achieved through chemical decontamination of meat. We look to EU policy-makers to put food safety, public health and consumer protection first when deciding on whether or not to allow PAA (or any other) poultry washes.

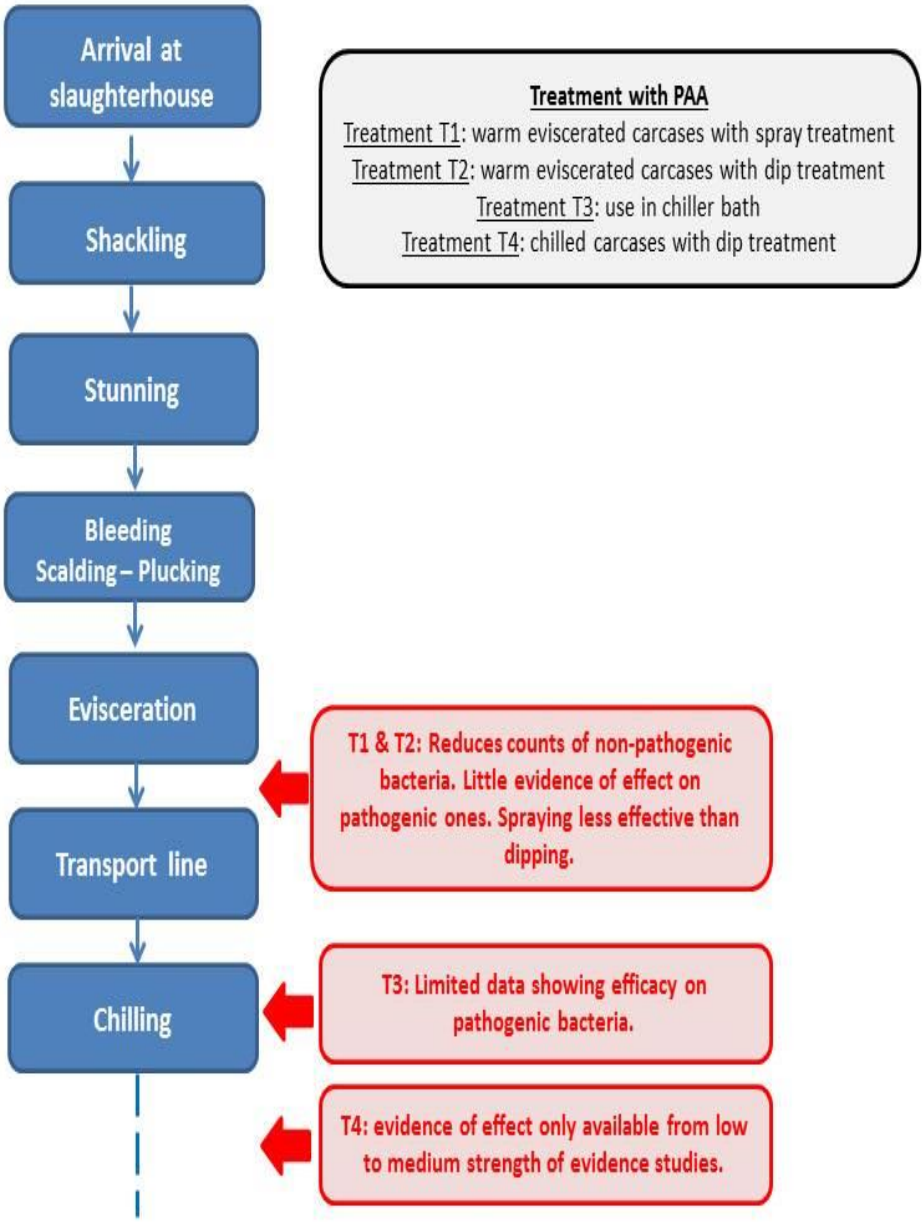
We thank you in advance for taking the above comments into account in view of the upcoming discussions on the European Commission's Campylobacter strategy.

Yours sincerely,

Monique Goyens
Director General

[11] CCEURO 27th Session (2010). CRD 2. EU comments on Agenda Item 8.

Annex I – Efficacy of PAA treatment at different steps in the poultry slaughter line



BEUC, 2014